

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION

No. 1:19-md-2875-RBK  
Hon. Robert Kugler

**PLAINTIFFS' REPLY IN SUPPORT OF OBJECTION TO  
SPECIAL MASTER REPORT AND ORDER NO. 46**

Plaintiffs, by and through the Plaintiffs' Executive Committee, respectfully file this brief reply in support of their Objection to the Special Master Report (ECF 1614) and Order No. 46 (ECF 1615) on Plaintiffs' Motion for Leave to File Amended Master Complaints (ECF 1148).

While the Wholesaler and Pharmacy Defendants have each filed an opposition to Plaintiffs' Objection, their oppositions merely restate the positions they took in their underlying motions to dismiss and oppositions to Plaintiffs' motion for leave. Plaintiffs have already fully addressed those issues in their initial memorandum in support of their Objection. To conserve the Court's time and resources, rather than simply paraphrase and restate those arguments here, Plaintiffs respectfully submit that the arguments made in their Objection are correct, and for reasons stated therein, request that the Court modify the Special Master's Report (ECF 1614) and Order No. 46 (ECF 1615) to allow leave to amend the Master Complaints to assert negligence claims against Wholesaler and Retail Pharmacy Defendants, and the implied warranty claims under the laws of the additional states and territories against Retail Pharmacy Defendants.

Dated: December 2, 2021

Respectfully submitted,

/s/ Behram V. Parekh

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***MDL Plaintiffs' Co-Lead Counsel***

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of December, 2021, I caused a true and correct copy of the foregoing to be filed and served upon all counsel of record by operation of the Court's CM/ECF system.

/s/ Behram V. Parekh

Behram V. Parekh